

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>No. 1:19-CR-0696 (PAE)</b>
	)	
<b>ARI TEMAN,</b>	)	
	)	
<b>Defendant.</b>	)	

**DECLARATION OF EDEN P. QUANTON IN SUPPORT OF  
MOTION FOR RECONSIDERATION**

I, Eden P. Quanton, declare under penalty of perjury that the following is true and correct:

1. I am counsel for Defendant Ari Teman (“Defendant” or “Teman”).
2. Teman was examined at Larkin Community Hospital on February 27, 2024.

Teman reports that he was given an oral diagnosis of what sounded like “Orchadia” but that he subsequently learned was “Orchialgia.”

3. Set forth as Exhibit A hereto is a true and accurate copy of an email received from Teman describing what he first understood to be a diagnosis of “Orchadia.”

4. Set forth as Exhibit B hereto is a true and accurate copy of an email received from Teman describing his oral diagnosis of “Orchialgia.”

5. Teman remains in extreme pain and is not receiving proper care.

- a. On March 1, 2024, Teman wrote, in an email entitled, “Refused short pass despite pain when walking,” “I asked for a short pass, to walk to food hall the short way around the lake, because the pain to the testicle is much worse going the long route (about 3-4x longer) and I’ve missed a couple meals because I get

around as the door is closing. They denied it saying, 'You do not qualify for a short pass.' However, the diagnosis of Orchialgia makes very clear that walking increases the pain. This is very true for me.”

- b. On March 2, 2024, Teman wrote, in an email entitled, “Still in pain,” “It's been impossible to sleep through the night, waking from pain, and my GI system is messed up from the tons of ibuprofin. I asked for a ‘Short Pass’ to take the short path to food hall and library/education, because it's painful to go the long round, and they refused it.”
- c. On March 6, 2024, Teman wrote, in an email entitled “Woke again,” “Woke at 3:13am in pain (checked watch), couldn't get back to sleep, no position was comfortable. Pain still ongoing. Asked warden to let me go to my doctors and get a clean month of diet as well to reduce inflammation and hopefully stop the pain.”
- d. On March 7, 2024, Teman wrote, in an email entitled “Another night of wakeups and pain,” “Another night of 2am, 3am, etc. wake ups from the pain and difficulty falling asleep . . . orchialgia is pain referred to the testicle from a nerve that is inflammed, infected, or injured elsewhere—and I have a history of degenerative disc disease and neurological conditions so that's likely where the issue is), or do anything for inflammation . . . I am still in extreme pain, and it is made worse after walking, sitting, and some movements. It seems to get worse over night as I lay down, too. The concerns outlined by Dr. Seifan remain. Over the past two days, my left leg has been going numb frequently. It is likely some inflammation somewhere along the spine, if I had to take a guess

(which I do, and which is why I want to be released to be treated by my spine doctor). As well, because of the significant and compounding sleep deprivation, now going on for a month+a week (!!!) from pain waking me up, I am concerned about my mental health. I am ok for now. I rest a lot, and am hyper-aware of my mental state, but there is only so long someone can go with such significant sleep interruption.”

- e. On March 9, 2024, in an email entitled, “i need help now,” Teman wrote, “I did not sleep at all, and am shaking and in tremendous pain in my neck, back, and genitals and the pain there is radiating up and to my right . . . it's worse than ever.”
- f. Later that day, in an email entitled simply, “hurting,” Teman wrote, “I asked Mr. Kost around 730am and Rev McCuuthy the chaplain around 920am after services to call medical because my left arm has been numb and twitching or spasming all day and my neck is in pain and they told me to just go to medical, but there was nobody there or nobody answered the door. Kost asked me first thing as i walked into his office ‘Why are you shivering? It's not cold.’ I explained I was not cold but have a tremor and asked him to get Dr. Chipi and he said he did not want to email her.”
- g. On March 15, 2024, in an email entitled, “Memorializing: Request to Unit Team,” Teman wrote “in excruciating pain and could not even fully bow when praying today b/c my spine is all jammed up.”
- h. On March 17, 2024, in an email entitled, “So much pain,” Teman stressed, “Pain was nearly constant and unbearable at times last night and this morning,

much worse without the 2nd mattress and pad . . . no support anymore for the back or neck. Tried bunching up a pair of sweatpants and a sheet to keep my head straight (well, physically, at least :)), but they shifted and now my neck is in even more pain.”


6. Before he was examined at Larkin Community Hospital, Teman sent numerous anguished emails stating that he feared his testicular pain could be immediately life-threatening or prevent him from having children.

7. Teman has reported severe inability to sleep that could help his system cope with neuro-inflammatory issues. Teman has indicated that he has had “psychotic reactions” to sleep medication in the past, making treatment and self-care impossible. The BOP’s response to Teman’s sleep complaints has been to threaten him with its extreme “suicide-watch” protocol under which he would be placed naked under a blanket below a spotlight shining 24/7 on him.

8. Teman reports that he has been unable to provide self-care with respect to his dietary needs because his parents’ requests to ship and pay for non-inflammatory foods have been rejected.

9. Rather than receiving appropriate dietary treatment, Teman has been injected with steroids, which he has had severe difficulty tolerating and which do not appear indicated for food allergies.

Dated: March 18, 2024  
New York, NY

  
EDEN P. QUAINTON